

RECEIVED
FEDERAL ELECTION
COMMISSION MAIL ROOM

July 31, 1997

Mr. Scott Francis
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington, DC 20463

AUG 4 9 18 AM '97

Dear Scott:

Please accept this letter and the accompanying attachments as Commerce Bancorp, Inc. Political Action Committee, Fed's response to your request for additional information in your letters dated July 2, 1997. The letters covered the October Quarterly Report (7/1/96 - 9/30/96) and the 30 Day Post-General Report (10/1/96 - 11/25/96) previously filed by that committee.

As indicated in the attached letters, we have requested refunds of the amounts in excess of \$1,000. The refunds will be disclosed on Schedule A supporting Line 16 of the report covering the period during which the refunds are received.

Thank you for your assistance in this matter.

Very truly yours,



Douglas J. Pauls
Assistant Treasurer, Commerce Bancorp, Inc.
Political Action Committee, FED

000303156

cc: C. Edward Jordan, Jr.

Friends of Jim Saxton
Box 795
Mt. Holly, NJ 08060
Attn: Ms. Patricia Walker, Treasurer

RECEIVED
FEDERAL ELECTION
COMMISSION
PUBLIC DISCLOSURE
DIVISION

July 31 10:58 AM '97
Aug 4

Dear Pat:

It has recently been brought to our attention that Commerce Bancorp, Inc. Political Action Committee Fed ("Compac Fed") does not yet qualify as a multi-candidate political committee under the Federal Election Commission guidelines. As such, Compac Fed is precluded from making contributions to candidates for federal office in excess of \$1,000 per election. On July 16, 1996, Compac Fed contributed \$5,000 to Friends of Jim Saxton. Given that Compac Fed did not qualify as a multi-candidate committee at that time, we must request a refund of \$4,000 of the July 16, 1996 contribution.

A copy of correspondence received from the Federal Election Commission is enclosed for your records. If you have any questions, I can be reached at (609)751-2727. The refund can be sent to my attention at the address below. Thank you for your help in resolving this matter.

Very truly yours,



Douglas J. Pauls
Assistant Treasurer, Commerce Bancorp, Inc.
Political Action Committee, Fed
Commerce Bancorp, Inc.
1701 Route 70 East
Cherry Hill, NJ 08034

cc: C. Edward Jordan, Jr.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

JUL - 2 1997

C. Edward Jordan Jr., Treasurer
Commerce Bancorp, Inc. Political
Action Committee Fed
1701 Route 70 East
Cherry Hill, NJ 08034

Identification Number: C00303156

Reference: October Quarterly Report (7/1/96-9/30/96)

Dear Mr. Jordan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a political committee, other than a multi-candidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$1,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on

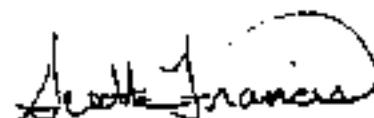
Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-For future filings, please note that your committee need only file the pages on which you have itemized activity. Schedules with no activity may be omitted.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Scott Francis
Reports Analyst
Reports Analysis Division

ITEMIZED DISBURSEMENTS

PAGE 1 OF 1
FOR LINE NUMBER

NAME OF COMMITTEE (in full)

Compaq-Fed

A. Full Name, Mailing Address and ZIP Code Friends of Jim Saxton P.O. Box 795 Mt. Holly, NJ 08060	Purpose of Disbursement NJ 3rd district	Date (month, day, year) 7/16/96	Amount of Each Disbursement This Period \$5,000
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

\$5,000

Frank LoBiondo for Congress
c/o Andrew J. McCrosson, Treasurer
PO Box 775
Marmora, NJ 08223

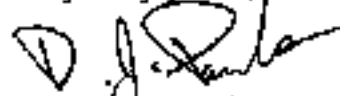
July 31, 1997

Dear Drew:

It has recently been brought to our attention that Commerce Bancorp, Inc. Political Action Committee Fed ("Compac Fed") does not yet qualify as a multi-candidate political committee under the Federal Election Commission guidelines. As such, Compac Fed is precluded from making contributions to candidates for federal office in excess of \$1,000 per election. On October 23, 1996, Compac Fed contributed \$2,000 to Frank LoBiondo for Congress. Given that Compac Fed did not qualify as a multi-candidate committee at that time, we must request a refund of \$1,000 of the October 23, 1996 contribution.

A copy of correspondence received from the Federal Election Commission is enclosed for your records. If you have any questions, I can be reached at (609)751-2727. The refund can be sent to my attention at the address below. Thank you for your help in resolving this matter.

Very truly yours,



Douglas J. Pauls
Assistant Treasurer, Commerce Bancorp, Inc.
Political Action Committee, Fed
Commerce Bancorp, Inc.
1701 Route 70 East
Cherry Hill, NJ 08034

cc: C. Edward Jordan, Jr.



FEDERAL ELECTION COMMISSION
WASHINGTON D.C. 20463

RQ-2

JUL - 2 1997

C. Edward Jordan Jr., Treasurer
Commerce Bancorp, Inc. Political
Action Committee Fed
1701 Route 70 East
Cherry Hill, NJ 08034

Identification Number: C00303156

Reference: 30 Day Post-General Report (10/1/96-11/25/96)

Dear Mr. Jordan:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a political committee, other than a multi-candidate committee, from making a contribution to a candidate for federal office in excess of \$1,000 per election. Please refer to the Campaign Guide for information on how a committee qualifies for multicandidate status.

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Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on

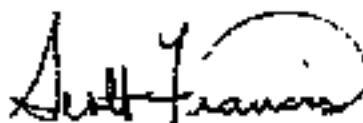
Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

-For future filings, please note that your committee need only file the pages on which you have itemized activity. Schedules with no activity may be omitted.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

A handwritten signature in dark ink, appearing to read "Scott Francis", with a large, stylized loop at the end.

Scott Francis
Reports Analyst
Reports Analysis Division

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

PAGE **OF**
FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Compac-Fed

A. Full Name, Mailing Address and ZIP Code

Frank Lobiundo for Congress
5914 Main Street, Suite 103
Mays Landing, NJ 08330

Purpose of Disbursement

NJ - 2nd district

Date (month,
day, year)

10/23/96

Amount of Each
Disbursement This Period

\$2,000.00

Disbursement for: ☐ Primary ☒ General
☐ Other (specify)

B. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)

Amount of Each
Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

C. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)

Amount of Each
Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

D. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)

Amount of Each
Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

E. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)

Amount of Each
Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

F. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)

Amount of Each
Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

G. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)

Amount of Each
Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

H. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)

Amount of Each
Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

I. Full Name, Mailing Address and ZIP Code

Purpose of Disbursement

Date (month,
day, year)

Amount of Each
Disbursement This Period

Disbursement for: ☐ Primary ☐ General
☐ Other (specify)

SUBTOTAL of Disbursements (This Page) (optional)

TOTAL This Period (last page this line number only)

\$2,000.00

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

☒ Hand Delivered

DATE OF RECEIPT

8/4/97

☐ First Class Mail

POSTMARKED

☐ Registered/Certified Mail

POSTMARKED

☐ No Postmark

☐ Postmark Illegible

☐ Received from the House Office of Records
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

WPN
PREPARER

8/4/97
DATE PREPARED